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July 13, 2023

MEMO ENDORSED

Via Electronic Case Filing

Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

> Re: United States of America v. Ross Baldwin Criminal Docket No. 21-CR-428

Dear Judge Ramos:

As Your Honor knows, this office represents Ross Baldwin who previously pled guilty before Your Honor and is awaiting sentencing. We have a control date of July 26, 2023. The trial against Mr. Johnson and his co-defendant has been pushed to November 7, 2023. Accordingly, and with the Government's consent, we would request an adjournment of the sentencing until the co-defendant's trial has been completed. In talking with Assistant United States Attorney, Mr. Clore and I were contemplating a six month adjournment, if that meets with the Court's approval. We would ask the court to set another control date for Mr. Baldwin near the end of 2023 or early 2024.

Thank you for your kind consideration of this request.

Respectfully submitted:

/s/ Marc Neff, Esquire
Marc Neff
Attorney for Ross Baldwin

cc: All counsel by ECF

The sentencing control date is adjourned to January 26, 2024 at 11 a.m. SO ORDERED.

Edgardo Ramos, U.S.D.J. Dated: 7/18/2023

New York, New York

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